

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE**

SHAFIQULLAH KOSHANI,

Plaintiff,

v.

ERIC WAYNE BARTON, and VANQUISH  
WORLDWIDE, L.L.C.,

Defendants.

Civil Action No. 3:17-cv-265

Judge Thomas W. Phillips

**NOTICE OF DEPOSITION**

PLEASE TAKE NOTICE that Plaintiff Shafiqullah Koshani, by counsel, will take the deposition upon oral examination of Defendant Vanquish Worldwide L.L.C. before an authorized court reporter and notary public at the below-identified location on **May 4, 2018 at 9:00 a.m.:**

Winchester, Sellers, Foster & Steele, PC  
800 S. Gay Street, Suite 1000  
Knoxville, TN 37929

This deposition will be used for discovery and/or trial.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiff hereby requests a designated representative or representatives of Vanquish Worldwide L.L.C. to appear for oral examination at the above time and place. The matters to which the representative will testify are attached hereto as Exhibit A.

Plaintiff further requires that the designated representative or representatives produce prior to or at the beginning of the deposition any and all documents which the representative(s) reviewed in preparation for the deposition, to the extent they were not previously produced.

The deposition will continue from day to day until completed. The deposition will be recorded by video and stenographic means.

EXHIBIT

J

Dated: April 12, 2018

Respectfully submitted,

/s/Tillman J. Finley

Tillman J. Finley (TN BPR #022790)

Daniel Marino (*pro hac vice*)

Kathrynn Benson (*pro hac vice*)

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*Attorneys for Plaintiff Shafiqullah Koshani*

**Attachment A**  
**to Deposition Notice to Vanquish Worldwide L.L.C.**

Plaintiff Shafiqullah Koshani hereby requests that a designated representative or representatives of Defendant Vanquish Worldwide L.L.C. appear for oral examination at the time and place identified in the forgoing Notice. The matters to which the representative(s) will testify are as follows:

1. Proposals submitted in the name of Vanquish Worldwide L.L.C. relating to business, projects, grants or other work in or relating to Afghanistan.
2. The creation, execution and all uses of the document entitled “Memorandum of Agreement Between Vanquish Worldwide and Vanquish Worldwide – Afghanistan” as found at Koshani 00016007 to 00016013.
3. The financing of the operations of Vanquish Worldwide L.L.C. from December 2010 through December 2012.
4. Vanquish Worldwide L.L.C.’s profit on any business, projects, grants or other work in or relating to Afghanistan from December 2010 to the present.
5. Vanquish Worldwide L.L.C.’s procedures, policies, methods, and practices with respect to financial recordkeeping from January 1, 2011 to the present.
6. Vanquish Worldwide L.L.C.’s allocation of overhead, general and administrative, bid and proposal and other costs to specific contracts and/or projects from December 2010 to the present.
7. All AISA licenses issued to or for Vanquish Worldwide L.L.C. and the steps taken to obtain them and communications with the United States Government about them.
8. Vanquish Worldwide L.L.C.’s claimed damages on its Counterclaims and the factual basis or bases therefor.

## **CERTIFICATE OF SERVICE**

I hereby certify that on April 12, 2018, I caused a copy of the foregoing and all attachments thereto to be served on the following counsel of record via email and United States mail, postage prepaid:

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/s/Tillman J. Finley  
TILLMAN J. FINLEY